

EXHIBIT “B”



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QUALIFICATIONS OF
MICHAEL R. STODDARD, JR., CFI

EXPERIENCE:

Fire Analyst - April 2006 - Present

Wright Group, Inc., Uxbridge, MA

Duties: Determine the origin and/or cause of fires; Document scenes with photographs, sketches, and notes; Collect and preserve evidence; Conduct forensic evidence analysis; Conduct forensic testing; Conduct interviews; Design analysis of products as it relates to failure modes and effects analysis; Conduct fire hazards analysis; Mechanical failure analysis of electrical and mechanical components; Building of design models and testing of designed products; Prepare comprehensive written reports regarding findings; Provide expert opinions and recommendations to clients and attorneys; Conduct technical review of cases with fellow analysts and engineers.

Fire Lieutenant/EMT - December 1992 – December 2013

Rutland Fire Department, Rutland, MA

Duties: Responding to fires, medicals, and other emergencies; Leadership as a company officer; Performing fire suppression and medical assistance; Driving and operating emergency vehicles and other related equipment; Assisting with fire prevention and public safety education; Assisting the fire chief in fire origin and cause investigations; Developing, implementing and teaching training programs including Safety, Rapid Intervention, Structural Firefighting, Search and Rescue, Ventilation, Live Burn Training.

Fire Analyst - October 2003 – March 2006

New England Fire Cause & Origin, Inc., Rochester, NH

Duties: Determine the origin and/or cause of fires; Document scenes with photographs, sketches, and notes; Collect and preserve evidence; Conduct interviews; Prepare comprehensive written reports regarding findings; Provide expert opinions and recommendations to clients and attorneys.

Supervisor of Fire Alarm Systems - April 2003 - September 2003

Monadnock Security Systems, Inc., New Ipswich, NH

Duties: Supervision of the Fire Alarm Division; Project management; Specification, design, and pricing of new fire alarm systems and of system upgrades; Code compliance review and recommendations; Liaison with state and local Authorities Having Jurisdiction; Pricing and procuring parts and materials; Directing technicians and laborers in regard to the installation, upgrade and repair of fire systems; System troubleshooting and repair; Customer service.

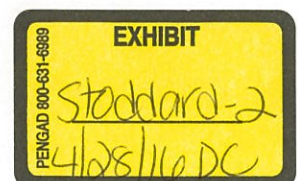
Production Technician - February 2002 - April 2003

Matec Instruments Corp., Northborough, MA

Duties: Assisted the engineering department in the development, fabrication and testing of prototype and custom ultrasonic inspection equipment for industrial applications. Machining and assembling components. Wiring systems and conducting electrical troubleshooting of limit switches and sensors. Testing operational capabilities and safeties. Design modification production and testing. Troubleshooting, repairing and upgrading equipment.



Putting Science & Technology to Work for You



Fire and Explosion Investigator - October 1999 - September 2001

Fire Science Technologies, Inc., Palmer, MA

Duties: Determine the origin and/or cause of fires and explosions; Document scenes with photographs, sketches, and notes; Collect and preserve evidence; Conduct interviews; Prepare comprehensive written reports regarding findings; Provide expert opinions and recommendations to clients and attorneys.

Secondary Duties: Performed vehicular theft investigations and ignition analysis; photographed and documented the vehicle; collected and preserved evidence; wrote reports and gave expert opinions to clients.

Firefighter - April 1997 - May 1999

Allington Volunteer Fire Association, West Haven, CT

Duties: Responded to fires and other emergencies; Performed fire suppression activities; Assisted with and participated in fire service training.

Intern - January 1999 - May 1999

City of New Haven Arson Squad, New Haven, CT

Duties: Assisted with fire origin and cause investigations being conducted by Arson Squad members; Duties included information gathering, helping collect statements and evidence and investigating fire scenes.

Intern - June 1998 - August 1998

Massachusetts State Fire Marshal's Office, Stow, MA

Duties: Observed and assisted with fire origin and cause investigations being conducted by the State Police Troopers of the Fire Investigation Section; Assisted in gathering and preparing data for the Massachusetts Fire Incident Reporting System; Performed basic office duties and various other research projects.

EDUCATION:

Quinsigamond Community College, Worcester, Massachusetts

Graduated: December 2012

Degree: Associates of Science in Electromechanical Technology

Related Course Work:

Electronics I & II, Digital Computer Circuits, Computer Hardware and Support, Instrumentation and Control Technology, Precalculus, Trigonometry, Physics I & II, Engineering Graphics, Networking Technologies, Programmable Logic Controllers, Robotics and Automated Systems

University of New Haven, West Haven, Connecticut

Graduated: May 1999

Degrees: Bachelors of Science in Arson Investigation

Minor: Criminal Justice

Associates of Science in Criminal Justice

Concentration: Law Enforcement Administration

Related Course Work:

Arson Investigation I and II; Fire and Casualty Insurance; Fire Science Chemistry; Building Construction Codes and Standards; Industrial Fire Protection; Public Fire Educator; Firefighting Strategy and Tactics; Fire Protection Law; Fire Protection Fluids and Systems; Fire Detection and Control; Introduction to Fire Prevention; Chemistry of Hazardous Materials; Fire Hazards Analysis; Intro. To Engineering, Principals of Criminal Investigations; Criminology; Criminal Law; Introduction to Forensic Science; Scientific Methods in Criminal Justice; Quantitative Applications in Criminal Justice

PRESENTATIONS & COURSES TAUGHT:

Clothes Dryer Fires

International Association of Arson Investigators – Maine Chapter
Yarmouth, ME
April 2014

Clothes Dryer Fires

International Association of Arson Investigators – Connecticut Chapter
27th Annual Arson Investigators Seminar – Rocky Hill, CT
November 2013

Clothes Dryer Fires

International Association of Arson Investigators
2013 International Training Conference – Orlando, FL
May 2013

Advanced Fire Investigation

Liberty Mutual Training Seminar – Hopkinton, MA
May 2011

Advanced Fire Investigation

Liberty Mutual Training Seminar – Hopkinton, MA
June 2010

It's Not Just A Lint Fire: Evaluating Subrogation Potential For Clothes Dryer Fires

National Association of Subrogation Professionals
2010 Annual Conference – Gaylord Texas
November 2010

Advanced Fire Investigation

Liberty Mutual Training Seminar – Hopkinton, MA
November 2009

CERTIFICATIONS:

Certified Fire Investigator (CFI)

International Association of Arson Investigators
December 2007

Certified Fire and Explosion Investigator (CFEI)

National Association of Fire Investigators
November 2000

Emergency Medical Technician - Basic

Massachusetts Office of Emergency Medical Services
April 2000

Public Fire Educator I

National Board of Fire Service Professional Qualifications
May 1999

Public Fire & Life Safety Educator I

Connecticut Fire Academy
May 1999



Firefighter II

National Board of Fire Service Professional Qualifications
May 1999

Firefighter II

Connecticut Fire Academy
May 1999

Hazardous Materials First Responder - Operational Level

Connecticut Fire Academy
September 1998

Firefighter I

National Board of Fire Service Professional Qualifications
May 1998

Firefighter I

Connecticut Fire Academy
May 1998

Hazardous Materials First Responder - Operational Level

Massachusetts Firefighting Academy
March 1993

TRAINING COURSES AND SEMINARS:

Massachusetts Chapter of International Association of Arson Investigators, Maynard, MA

Fire Science for the Fire Investigator / NFPA 1033
November 2015 - 6 Hours

Massachusetts Chapter of International Association of Arson Investigators, Maynard, MA

Haz-Mat Safety for the Fire Scene & Fire Investigator / NFPA 1033
September 2015 - 6 Hours

National Association of Subrogation Professionals, Worcester, MA

NASP's Subro College 200 Training Session
May 2014 - 6 Hours

Massachusetts Chapter of International Association of Arson Investigators, Chicopee, MA

Furnaces, NFPA 921 & Daubert
March 2014 - 6 Hours

International Association of Arson Investigators, Orlando, FL

2013 International Training Conference General Session
May 2013 - 36 Hours

International Association of Arson Investigators, Online - CFITrainer.Net

The Fire Investigator & the 2011 NFPA 921 Changes
November 2012 - 4 Hours

International Association of Arson Investigators, Online - CFITrainer.Net

Motive, Means, and Opportunity: Determining Responsibility in an Arson Case
November 2012 - 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
The Practical Application of the Relationship between NFPA 1033 and NFPA 921
November 2012 – 2 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
How First Responders Impact the Fire Investigation
November 2012 – 2 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Fundamentals of Interviewing
November 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
The HAZWOPER Standard
November 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Insurance and the Fire Investigation
November 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
The Potential Value of Electronic Evidence in Fire Investigations
November 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Evidence Examination: What Happens at the Lab?
November 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Arc Mapping Basics
October 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
A Ventilation-Focused Approach to the Impact of Building Structures and Systems on Fire
October 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Understanding Fire through the Candle Experiments
October 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Digital Photography and the Fire Investigator
October 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Documenting the Event
October 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Electrical Safety
October 2012 – 3 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Using Resources to Validate your Hypothesis
October 2012 – 2 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Introduction to Evidence
October 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
NFPA 1033 and Your Career
October 2012 – 2 Hour

International Association of Arson Investigators, Online – CFITrainer.Net
Physical Evidence at the Fire Scene
October 2012 – 4 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Writing the Initial Origin and Cause Report
October 2012 – 3 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Fire Investigator Scene Safety
October 2012 – 3 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
The Scientific Method for Fire and Explosion Investigation
October 2012 – 3 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Using Resources to Validate your Hypothesis
October 2012 – 2 Hours

International Association of Arson Investigators, Online – CFITrainer.Net
Vacant and Abandoned Buildings: Hazards and Solutions
October 2012 – 4 Hours

Whirlpool Corporation, Benton Harbor, Michigan
Product Safety Tools, Safety Audit Simulation & Fire Investigation Simulation
May 2012 – 17 Hours

Whirlpool Corporation, Online
Product Safety Tools
April 2012 – 2 Hours

National Association of Subrogation Professionals 2010 Annual Conference, Gaylord, Texas
Choosing the Right Expert in a Design Defect Case, Product Liability and Warning Hazardous Product
Safety, Safety Engineering
November 2010 – 20 Hours

International Association of Arson Investigators/Association of Home Appliance Manufacturers, Nashville,
TN
Investigation of Electrical and Appliance Related Fires: A Technical/Scientific Approach
November 2008 - 21 Hours

Massachusetts Chapter of International Association of Arson Investigators, Barnstable, MA
Appliance Fires
June 2007 - 15 Hours

Massachusetts Chapter of International Association of Arson Investigators, Auburn, MA
Lightning Strike Investigations & Crime Scene Awareness
November 2006 - 6 Hours

Massachusetts Chapter of International Association of Arson Investigators, Barnstable, MA
Fire and Arson Investigation Seminar
June 2006 - 15 Hours

Massachusetts Chapter of International Association of Arson Investigators, Barnstable, MA
Fire and Arson Investigation Seminar
June 2005 - 15 Hours

Massachusetts Firefighting Academy, Stow, MA
Firefighter Survival Skills - Saving Ourselves
May 2005 - 12 Hours

Massachusetts Firefighting Academy, Stow, MA
Rapid Intervention
April 2005 - 12 Hours

The Institute of Fire Science, Rochester, NH
Gas/Oil Service & Appliances
September 2004 - 24 Hours

National Fire Academy, Emmitsburg, MD
Incident Safety Officer
September 2004 - 16 Hours

Massachusetts Chapter of International Association of Arson Investigators/International Association of Marine Investigators/New England Association of Insurance Fraud Investigators, Hyannis, MA
1st Annual Joint Training Seminar
June 2004 - 20 Hours

Massachusetts Firefighting Academy, Stow, MA
Aerial Ladders
May 2004 - 12 Hours

Massachusetts Chapter of International Association of Arson Investigators, Auburn, MA
Propane Fires
March 2004 - 6 Hours

National Fire Academy, Emmitsburg, MD
Fire Prevention For High Risk Populations: Age & Disability Factors
September 2003 - 16 Hours

National Fire Academy, Emmitsburg, MD
Courtroom Preparation & Testimony for First Responders
September 2002 - 16 Hours

Massachusetts Firefighting Academy, Stow, MA
Vehicle Extrication: New Technology
April 2001 - 6 Hours

National Fire Academy, Emmitsburg, MD
Managing Company Tactical Operations - Tactics
April 2001 - 16 Hours



Saint Anselm College, Manchester, NH
22nd Annual New England Arson Seminar
May 2000 - 40 Hours

Massachusetts Chapter of International Association of Arson Investigators, Auburn, MA
Electrical Fires/Motor Vehicle Fires
November 1999 - 6 Hours

Massachusetts Chapter of International Association of Arson Investigators, Barnstable, MA
From Ignition to Litigation
June 1999 - 15 Hours

Connecticut Fire Academy, Windsor Locks, CT
Public Fire & Life Safety Educator I
May 1999 - 60 Hours

Connecticut Fire Academy, Windsor Locks, CT
Firefighter II
May 1999 - 174 Hours

Public Agency Training Council, Worcester, MA
Arson/Fire Origin Investigation & Arson Case Management
November 1998 - 24 Hours

Connecticut Fire Academy, Windsor Locks, CT
Hazardous Materials First Responder - Operational Level
September 1998 - 16 Hours

Connecticut Fire Academy, Windsor Locks, CT
Firefighter I
May 1998 - 157 Hours

Massachusetts Firefighting Academy, Stow, MA
Firefighter I Training Program
November 1995 - 120 Hours

Massachusetts Firefighting Academy, Stow, MA
Pumps and Hydraulics
March 1995 - 12 Hours

Meadowood County Area Fire Dept., Fitzwilliam, NH
Introduction to Aircraft Emergencies
September 1993 - 8 Hours

Meadowood County Area Fire Dept., Fitzwilliam, NH
Portable Fire Extinguishers
May 1993 - 8 Hours

Meadowood County Area Fire Dept., Fitzwilliam, NH
Tactics and Procedures
May 1993 - 8 Hours

Massachusetts Firefighting Academy, Stow, MA
Hazardous Materials First Responder - Operational Level
March 1993 - 8 Hours



MEMBERSHIPS/ORGANIZATIONS:

International Association of Arson Investigators

Massachusetts Chapter; International Association of Arson Investigators

Fire Science Alumni, University of New Haven, CT

Rutland Fire Brigade

Michael R Stoddard, Jr.
Deposition & Trial Log

DEPOSITION TESTIMONY

- 1) October 4, 2006
Commonwealth of Massachusetts, Norfolk Superior Court
Plaintiff:
Quincy Mutual Fire Insurance Company a/s/o Douglas & Marla Londraville
Defendant:
General Electric Company & Samsung Electronics
- 2) December 20, 2006
State of New Hampshire, Merrimack Superior Court
Plaintiff:
Martin Bender, Administrator of the Estate of Dennis B Weir
Defendant:
Mt. Washington Assurance Corporation
- 3) July 9, 2009
United States District Court, District of Massachusetts
Plaintiff:
New Hampshire Insurance Co. – Russo Marine Mart, Vigilant Insurance Co.
Defendant:
Traveler's Insurance – Robert Callaway a/s/o Alliance
- 4) July 17, 2009
United States District Court, District of Massachusetts
Plaintiff:
The Phoenix Insurance Company, a/s/o Vernon Letourneau and Margaret Letourneau
Defendant:
Deere & Company, and Home Depot USA, Inc.
- 5) May 14, 2010
United States District Court, Eastern District of Pennsylvania
Plaintiff:
Donegal Mutual Insurance, a/s/o Vanessa Schantz
Defendant:
Electrolux North America
- 6) January 13, 2011
United States District Court, Southern District of New York
Plaintiff:
Karen Russell
Defendant:
Electrolux Home Products, Inc.
- 7) November 9, 2011 & December 22, 2011 (Continued)
United States District Court, Eastern District of New York
Plaintiff:
State Farm Fire & Casualty Co. a/s/o Norman Deitch
Defendant:
Electrolux Home Products, Inc. and B.D.F Appliances, Inc. d/b/a Northern Home Appliances

- 8) June 8, 2012
Superior Court of the State of California for the County of Los Angeles - North Central District
Plaintiff:
State Farm General Insurance Company
Defendant:
Electrolux Home Products, Inc.; Sears Roebuck and Co.; and Does 1 Through 25
- 9) August 24, 2012
United States District Court – Southern District of California
Plaintiff:
American National Property & Casualty Company a/s/o Victor and Melissa Huevo
Defendant:
Electrolux Home Products, Inc.
- 10) September 21, 2012
Circuit Court of the Twelfth Judicial Circuit – Will County, Illinois
Plaintiff:
Allstate Insurance Company a/s/o Christina M. Domagala
Defendant:
Electrolux Home Products, Inc. & John Does (1-10)
- 11) March 5, 2013
United States District Court – Southern District of Indiana Indianapolis Division
Plaintiff:
Liberty Mutual Fire Insurance Company a/s/o Gary and Ramona Dyer
Defendant:
Electrolux Home Products, Inc.
- 12) March 25, 2013
United States District Court – Northern District of Ohio
Plaintiff:
Allstate Insurance Company a/s/o Shasta Pieper
Defendant:
Electrolux Home Products, Inc.
- 13) November 11, 2013
Commonwealth of Massachusetts, Middlesex Superior Court
Plaintiff:
USAA Casualty Insurance Company a/s/o of Mark and Jennifer Dougherty
Defendant:
Domus Design-Building, Inc. and Philip Cordeiro
- 14) December 27, 2013
United States District Court – Southern District of New York
Plaintiff:
Oleg Cassini, Inc.
Defendant:
Electrolux Home Products, Inc.
- 15) January 29, 2014
United States District Court – Collin County, Texas
Plaintiff:
State Farm Lloyds Insurance Co. a/s/o Carol Greer
Defendants:
Sears Roebuck and Co., Electrolux Home Products, Inc. and American Home Shield Corp.

- 16) May 22, 2014 & May 23, 2014
United States District Court – Western District of Wisconsin
Plaintiff:
American Family Mutual Insurance Co.
Defendant:
Electrolux Home Products, Inc.
- 17) January 13, 2015
United States District Court – Northern District of Illinois, Eastern Division
Plaintiff:
MemberSelect Insurance Co., a/s/o Chris and Renata Loiotile
Defendant:
Electrolux Home Products, Inc. and Sears Holding Corporation
- 18) March 23, 2015
United States District Court – Northern District of Texas, Tarrant Division
Plaintiff:
State Farm Lloyds Insurance Co., a/s/o Tameka Washington
Defendant:
Aaron's, Inc. and Electrolux Home Products, Inc.
- 19) May 6, 2015
United States District Court – Central District of Illinois
Plaintiff:
Badger Mutual Insurance Co.
Defendant:
Electrolux North America, Inc.
- 20) September 23, 2015
State of Illinois Circuit Court of the Twelfth Judicial District – County of Will
Plaintiff:
Allstate Insurance Company a/s/o Jeremy Landfare
Defendant:
Electrolux Home Products, Inc.
- 21) October 9, 2015
United States District Court - Eastern District of Pennsylvania
Plaintiff:
Maureen and Christopher Walton
Defendant:
Electrolux Home Products, Inc.
- 22) February 23, 2016
Commonwealth of Massachusetts Superior Court of Essex County
Plaintiff:
Liberty Mutual First Insurance Co. a/s/o Linda and Nicolas Rowe
Defendant:
Schneider Electric IT Corporation
- 23) April 19, 2016
United States District Court - Northern District of California - San Francisco Division
Plaintiff:
Allstate Insurance Co.
Defendant:
Electrolux Home Products, Inc.

TRIAL TESTIMONY

- 1) September 8, 2009
State of New York Supreme Court, County of Albany
Plaintiff:
Mountain Valley Indemnity Company a/s/o Mercer Development, LLC and a/s/o City Square
Defendant:
Northeast Fire Protection Systems, Inc.
- 2) June 13-14, 2012
Superior Court of the State of California for the County of Los Angeles - North Central District
Plaintiff:
State Farm General Insurance Company
Defendant:
Electrolux Home Products, Inc.; Sears Roebuck and Co.; and Does 1 Through 25
- 3) May 14, 2014
United States District Court – Southern District of California
Plaintiff:
American National Property & Casualty Company a/s/o Victor and Melissa Huevo
Defendant:
Electrolux Home Products, Inc.
- 4) November 24, 2014
Commonwealth of Massachusetts, Middlesex Superior Court
Plaintiff:
USAA Casualty Insurance Company a/s/o of Mark and Jennifer Dougherty
Defendant:
Philip Cordeiro